

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

LINDY G. WRIGHT,

Plaintiff

v

CHATTAHOOCHEE VALLEY COMMUNITY

COLLEGE, et al.,

Defendants

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Case No.: 3-06-CV-1087-WKW

PROPOSED DISCOVERY PLAN

1. In accord with *Federal Rules of Civil Procedure* 26(f), the parties have agreed to the following proposed discovery plan. The agreement was reached by and between the following attorneys:

Peter A. Dumbuya for the plaintiff.

Jennifer B. Cooley for the plaintiff

Joan Yvette Davis for the defendants Chattahoochee Valley Community College, Dr. Laurel Blackwell, Dr. James Lowe, and Dr. Dixie Peterson.

H.E. Nix, Jr. for the defendants Chattahoochee Valley Community College, Dr. Laurel Blackwell, Dr. James Lowe, and Dr. Dixie Peterson.

2. **Pre-Discovery Disclosures**: The parties will exchange the information required by *Federal Rules of Civil Procedure* 26(a)(1) within twenty-one (21) days of the Court's Scheduling Conference Order. The parties will supplement the disclosures with regard to witnesses no later than February 28, 2007.

3. **Discovery Plan**: The parties jointly propose to the Court the following discovery plan: Discovery will be needed on questions of liability, affirmative defenses, and injury claims.

Discovery will be completed by August 1, 2007. Depositions to preserve the testimony of witnesses disclosed no later than February 28, 2007, may be taken after the discovery completion date of August 1, 2007, with the provision that such depositions will be completed at least 16 days prior to trial.

Maximum of 30 interrogatories by each party to any other party. [Responses due 30 days after service].

Maximum of 25 requests for production by each party to any other party. [Responses due 30 days after service].

Maximum of 15 requests for admissions by each party to any other party. [Responses due 30 days after service].

Maximum of 10 depositions by plaintiff and 10 for defendants.

Each deposition, other than that of named parties, is limited to a maximum of three hours unless extended by agreement of the parties. Each deposition of the named parties is limited to eight hours unless modified by agreement of the parties.

Reports from retained experts under Rule 26(a)(2) due from plaintiff by August 1, 2007, and from defendants by August 1, 2007.

Supplementations under Rule 26(e) due within 14 days of when a party learns that in some material respect the information disclosed is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to other parties in the discovery process or in writing.

4. **Other Items:**

The parties do not request a conference with the Court before entry of the Scheduling/Discovery Order.

The parties request a pre-trial conference after December 1, 2007, with sufficient time for the Court to consider dispositive motions filed by August 1, 2007.

Plaintiff should be allowed until March 1, 2007, to join additional parties and until April 1, 2007, to amend the pleadings.

Defendants should be allowed until March 1, 2007, to join additional parties and until April 1, 2007, to amend the pleadings.

All potential dispositive motions should be filed within 90 days before the pre-trial conference.

Final lists of witnesses under Rule 26(a)(3) should be due from plaintiff three weeks before the pre-trial conference and from defendants three weeks before the pre-trial conference.

Final lists of exhibits under Rule 26(a)(3) should be due from plaintiff three weeks before the trial date and from defendants three weeks before the trial date.

Parties should have 14 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial following resolution of any dispositive motions, and is expected to take one to two days.

SO ORDERED.

Judge, United States District Court
Dated: _____.

Respectfully submitted,

/s/ Peter A. Dumbuya .
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/s/ Jennifer B. Cooley .
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